

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CITY OF CLEVELAND)	CASE NO. 1:23-cv-00617-CEF
)	
<i>Plaintiff,</i>)	JUDGE CHARLES E. FLEMMING
)	
v.)	<u>DEFENDANTS JOINT MOTION FOR</u>
)	<u>EXTENSION OF TIME TO MOVE,</u>
SHAKER HEIGHTS APARTMENTS)	<u>PLEAD OR OTHERWISE RESPOND TO</u>
OWNER, LLC)	<u>PLAINTIFF'S COMPLAINT</u>
)	
<i>Defendant.</i>)	

Now come Defendants Shaker Heights Apartments Owner, LLC; Shaker Heights Member, LLC; E&M Management, LLC; Eli Weiss aka Eliezer Weiss; Mordecai Weiss aka Morty Weiss; Yaacov Amar; Michael Chetrit; and Danielle Nickerson a/k/a Danielle Hollifield (collectively "Defendants") by and through undersigned counsel and respectfully request this Court to grant them an additional fourteen (14) days, until on or before April 12, 2007, to move, plead or otherwise respond to Plaintiff's Complaint.

As grounds for this request, Defendants engaged undersigned counsel on March 22, 2022. On that same day, Defendants removed this action from State Court to this Court. Pursuant to Fed. R. Civ. P. 81(c) Defendants have twenty-one (21) days from the date they were served with the summons and complaint or seven (7) days from the date of removal, whichever is longer to respond to the Complaint.

Undersigned counsel is attempting to get up to speed as quickly as possible, but due to the complexity of the matter and other pressing obligations, Defendants respectfully request a short extension of time to respond to Plaintiff's Complaint. Defendants attempted to contact Plaintiff's counsel prior to filing this Motion, but as of yet they have not received a response to

their request for additional time. This is Defendants first request for an extension of time. This request is not being interposed for the purpose of delay and the granting of this request will not prejudice Plaintiff or any other party to these proceedings, as service has not yet been perfected on all Defendants.

Respectfully submitted,

/s/ Grant J. Keating_____.

Grant J. Keating (#0079381)

Patrick J. Perotti (#0005481)

DWORKEN & BERNSTEIN CO., L.P.A.

1468 W. 9th St., Suite 135

Cleveland, Ohio 44113

Phone: (216) 861-4211

Fax: (216) 861-1403

Email: gkeating@dworkenlaw.com

pperotti@dworkenlaw.com

Attorneys for Defendants

Shaker Heights Apartments Owner, LLC,

Shaker Heights Member, LLC, Michael Chetrit,

Danielle Holifield aka Danielle Nickerson, E&M

Management, LLC, Eli Weiss aka Eliezer Weiss,

Mordecai Weiss AKA Morty Weiss and

Yaacov Amar

CERTIFICATE OF SERVICE

A copy of the within Joint Motion for Extension of Time To Move, Plead or Otherwise Respond to Plaintiff's Complaint was served this 29th day of March, 2023, upon all parties via the court's electronic filing system and U.S. mail to the parties who have not yet filed a notice of appearance.

/s/ Grant J. Keating_____.

Grant J. Keating (#0079381)

Patrick J. Perotti (#0005481)

DWORKEN & BERNSTEIN CO., L.P.A.

1468 W. 9th St., Suite 135

Cleveland, Ohio 44113

Phone: (216) 861-4211

Fax: (216) 861-1403

Email: gkeating@dworcenlaw.com

pperotti@dworcenlaw.com

Attorneys for Defendants

Shaker Heights Apartments Owner, LLC,

Shaker Heights Member, LLC, Michael Chetrit,

Danielle Holifield aka Danielle Nickerson, E&M

Management, LLC, Eli Weiss aka Eliezer Weiss,

Mordecai Weiss AKA Morty Weiss and

Yaacov Amar